My name is Carl Towns, I am a singer/songwriter and music Publisherliving in the Chattanooga, ${\tt Tn}$ area.

I have played one form of music or other since I was 3 years old. My family has always been involved in music. I have been involved in regional, national and International recordings, with several songs of my own recorded. I have lost count of the exact number of songs I have written, but know it is over 100. Some of these songs were included on the 7 albums I have either released as my own, or played as a guest on.

Currently; I have my own band, we are not signed by any label at the moment, I do most of the marketing myself.

I perform frequently with my band and others in the Eastern US, hoping to expand nationally and internationally. My fans continue to grow, whether they are fans of the band, or my singing, songwriting or music in general. I can fill a decent sized venue with the right advertising.

It is my experience that the "big" stations turn a deaf ear to musicans of my ilk. Without the backing of major label money and yes, payola still occurs, it is a futile attempt to even waste resources in sending one of these stations a CD to try to get airplay.

There are smaller stations in my area who have requested CD's and in some cases; play my brand of music.

My "Cherokee Wind" song gets occasional airplay on WEPG in South Pittsburg, TN being local to me. They are the only station who have played it in my area for any length of time and I am thankful for that.

There are local programs that highlight talent in my area. College radio here has talent spotlights, though it is specific to a genre which I am not associated with. If there were more local programming, for more genres of music, it would be a tremendous help.

I don't think local stations do enough to support the local music scene. This tri-state area in which I live(Chattanooga, TN) is host to countless talents: bands, singers, musicians. All of which are as good and in most cases better, than what you hear on the "big" radio shows. I think it has a lot to do with funding, and there should be programs that provide for this, will it ever happen? Local talent is almost always shunned, for someone who "lip-syncs" and covers up there less than adequate singing with digital processes and appearance to take away focus from their non-talent. Sad but true. Not all mind you, but some and it's growing.

I think the FCC should require at least some local programming, using a simple definition: Talent within the listening area of that station, or, in other words; within that market area.

It is easily defined by where the group is based, and what stations reach that area. This would be restricted to non-internet radio. Stations that can be "tuned in" from that area. This could be a minimum requirement, X amount of songs for local programs.

This could create one or more jobs, in requiring a Local Programming director to communicate with local talent, indie labels, etc concerning their releases. Establish relationships with these entities and listen to

eligble music or other programming to decide which ones make the grade.

The keyword is "local". Any possible programming that has local bearing. This means, musicians, bands, singers, songwriting, production, labels, and other items that are involved with the release of any music to the public. For instance; a Music CD has Artists, Producers, Songwriters, Artwork, and other aspects that require that finished radio ready product to be made available. If the entity which executed that aspect of the CD is within the loca listening area, the cd could qualify for local programming, with Jockeys stating why that CD is local. this is not only interesting but gives a shout-out to the public about their hometown talents.

As I mentioned above, the local programming area is pinpointed by Radio Tunable Frequencies that are accessible from the location of that entity. For example; a songwriter lives in Anytown USA and WXXX is within that songwriter's analog listening area(not web broadcasting), this would qualify for local programming.

I do think the FCC should define "local programming", but allow stations to decide if that release is truly Radio Ready. Though their could be discretions in this area.

Though I have focused mainly on musical programming, I think local programming would be according to the stations format. A Talk show should have local guests on, another station may have the local highschool game on.

I think our sense of Hometown feel has gotten lost in today's world. The pride of the home town is lost in the Info age, people agre not in touch with each other any more. Real Neighbors are hard to come by, I think local programming could benefit our society by bringing some of that back into our lives.

Snce the main thing is broadcasting, I don't think this should qualify as a credit towards their programming requirement, in general. However; if this event or activity is broadcast it should be credited.

Also; there should be regulations that define and require an amount of each type of programming. For instance; X amount of hours for local music, X amount for Local Events, etc.

I have not given, received or witnessed any payola occuring, but it evident of it's existence in today's "money-oriented" society. I ahve heard from various individuals of payola occuring.

I do not think any programming, should be influenced by the payment of money, except for ads.

No station should play music or other programming because the principle involved in producing that product pays them money. Greed is the root of all evils, and payola is one of those. This hurts local talent, organizations, and other possible local programming candidates because the one with the biggest bankroll can get programming over those who do not have the resources. Once again; big wins over little, rich over poor. It's not a Utopia, I realize that will never be acheived in this age, but..can we not allow everyone to have a chance to be heard? The FCC has the power to accomplish this.

In the case of artists performing for free for a Radio Station, this should not be considered payola, because the artist is getting exposure for free, the station is supplying for the artist, and the public for free(virtually).

As I said before, ads are the only programming that should be paid for. Artists should be considered for their talent, not their buying power. This "ad purchasing" by record labels is only an ad, IF the ad's include where to buy that artist's cd or where to get more information. If the song was all that was played, it would only be a work-around payola.

I think a lot more could be done to discourage payola, and give others a chance.

Any misleading of the public by any organization is a down-right unethical practice and the organization should be penalized for that reason. This carries to artists who do not sing as well as their release makes them sound. You go to their show and they sound awful. Same with radio, In the old days, people had a word for saying something that isn't true, it was called "Lying" back in those days. How many people would continue listening to broadcasters, if they knew they were lying to them?

I think some voice tracking is ok, as long as they are not pretending to be local. Syndicated shows are fine, just don't act local if you ain't.

However; this should not be the only programming on the station. They must be required to carry some legitimate local programming.

National Playlists limit the ability of true locals to get airtime. I think it is best for a real person, local to the area to decide on local programming, after all "local programming" that isn't managed by local people isn't local at all , is it.

I think it is obvious with the previous comments I have made, that I htink stations should be required to have a certain amount of true to life local programming.

LPFM Stations are truly Local! They enhance the local experience and provide independents a valuable resource in getting their "voices" heard, literally.

I think these licenses should be encouraged and preferred as they are focused on the area in which they exist, in most cases, and indeed benefit the local music community by helping the less-wealthy artist to promote their material. It also allows start-ups to get a little exposure that they would not normally have access to in the current situation.

I want to thank you for reading my comments. It is a very important issue to me, has always been. I think it is wonderful and intelligent that you allow the public to voice their concerns on this subject. I pray that the responses you receive will make it easy for you to realize that to achieve a truly "Hometown" program, there are regulations and procedures that should be established and followed to give local programming a true chance on the level that any business should focus upon: The Local Level.

Thank you and God Bless You. Carl Towns Singer / Songriter / Musician Abiel Publishing PO Box 365 Wildwood, GA 30757